

ORIGINAL

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FILED
DISTRICT COURT OF GUAM

OCT - 2 2007 *mba*

JEANNE G. QUINATA
Clerk of Court

UNITED STATES DISTRICT COURT
TERRITORY OF GUAM

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

Plaintiff,

vs.

LEO PALACE RESORT,

Defendant.

CIVIL CASE NO. 06-00028

NOTICE OF LODGING OF
ORIGINAL SIGNATURE OF EEOC
COUNSEL ANGELA MORRISON

COMES NOW the United States and lodges with the Court, the original signature, of the
government's Declaration of Angela Morrison in Plaintiff EEOC's Opposition to Defendant's

1 Partial Summary Judgment in the above entitled matter, a facsimile copy of which was
2 previously filed on September 24, 2007.

3 DATED: October 1, 2007.

4
5 LEONARD M. RAPADAS
6 United States Attorney
7 Districts of Guam and NMI

8 BY: 

9 MIKEL W. SCHWAB
10 Assistant U.S. Attorney
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20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF GUAM**

22 U.S. EQUAL EMPLOYMENT
23 OPPORTUNITY COMMISSION,

24 Plaintiff,

25 v.

26 LEO PALACE RESORT,

27 Defendant.

28 JENNIFER HOLBROOK; VIVIENE
29 VILLANUEVA; and ROSEMARIE
30 TAIMANGLO,

31 Plaintiff-Intervenors,

32 v.

33 MDI GUAM CORPORATION d/b/a LEO
34 PALACE RESORT MANENGGON
35 HILLS and DOES 1 through 10,

36 Defendants.

Case No.: 2:06-CV-00028

DECLARATION OF ANGELA
MORRISON IN SUPPORT OF
PLAINTIFF EEOC'S OPPOSITION
TO DEFENDANT'S PARTIAL
MOTION FOR SUMMARY
JUDGMENT

1 I, Angela D. Morrison, declare and state:

2 1. I am a Trial Attorney employed at the Las Vegas Local Office, Los Angeles
3 District Office of the United States Equal Employment Opportunity Commission. I have
4 personal knowledge of the facts stated herein, and if called as a witness to testify as to the
5 matters stated herein, I could and would competently do so.
6

7 2. Attached hereto as Exhibit 1 are true and correct copies of documents Bates
8 stamped numbers LPR 00002, 00003, 00004, 00006, 00028, 00039, 00058, 00091,
9 00134, 00139, 00182, 00183, 00184, 00185, 00186, 00187 provided to the EEOC by
10 Defendant Leo Palace via discovery. The documents are redacted to protect personal
11 information such as social security numbers, home addresses, home telephone numbers,
12 and dates of birth. In addition LPR 00187 is redacted pursuant to Fed. R. Evid. 408.
13

14 3. Attached hereto as Exhibit 2 are true and correct copy of excerpts of the
15 deposition transcript of Vivienne Villanueva.
16

17 4. Attached hereto as Exhibit 3 are true and correct copy of excerpts of the
18 deposition transcript of Jennifer Holbrook.
19

20 5. Attached hereto as Exhibit 4 are true and correct copy of excerpts of the
21 deposition transcript of Rosemarie Taimanglo.
22

23 6. Attached hereto as Exhibit 5 are true and correct copy of excerpts of the
24 condensed deposition transcript of Gregory Perez.
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26 7. Attached hereto as Exhibit 6 are true and correct copy of excerpts of the
27 deposition transcript of May Paulino.
28

1 8. Attached hereto as Exhibit 7 are true and correct copy of excerpts of the
2 deposition transcript of Satoshi Suzuki.

3 9. Attached hereto as Exhibit 8 are true and correct copy of excerpts of the
4 deposition transcript of Yutaka Maruyama.
5

6 10. Attached hereto as Exhibit 9 is a true and correct copy of the Treatment
7 Summary for Rosemarie Taimanglo prepared by Dr. Lilli Perez Iyechad.
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9 11. Attached hereto as Exhibit 10 is a true and correct copy of the Treatment
10 Summary for Jennifer Holbrook prepared by Dr. Lilli Perez Iyechad.

11 12. Attached hereto as Exhibit 11 is a true and correct copy of the Treatment
12 Summary for Jennifer Holbrook prepared by Tom Babauta, MSW.
13

14 13. Attached hereto as Exhibit 12 is a true and correct copy of the Treatment
15 Summary for Vivienne Villanueva prepared by Tom Babauta MSW.

16 14. Attached hereto as Exhibit 13 are true and correct copy of excerpts of the
17 deposition transcript of Tom Babauta, MSW. The transcript is redacted to protect the
18 privacy of a third-party.
19

20 I declare under penalty of perjury that the foregoing is true and correct. Executed
21 this 24th day of September, 2007, at Las Vegas, Nevada.
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24 
25 Angela D. Morrison
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